

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: ABIGAIL ROSE REESE : CHAPTER 13
Debtor :
 :
 :
 JACK N. ZAHAROPOULOS :
 STANDING CHAPTER 13 TRUSTEE :
 Movant :
 :
 :
 vs. :
 :
 :
 ABIGAIL ROSE REESE :
 Respondent : CASE NO. 5-22-bk-02102

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 5th day of December, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. Failure to properly state the liquidation value in Section 1B of the plan.
2. The Trustee provides notice to the Court as to the ineffectiveness of debtor's Chapter 13 Plan for the following reasons:
 - a. Clarification of vesting of property. Because non-exempt equity exists, the plan should provide for vesting at closing. Accordingly, the plan violates § 1325(a)(4).

WHEREFORE, Trustee alleges and avers that debtor's plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 9th day of December, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Jason Provinzano, Esquire
16 W. Northampton Street
Wilkes Barre, PA 18701

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee